PEERLESS ACCESSIBILITY PLAN

PROGRESS REPORT

Airus, Inc. d/b/a Peerless Network

June 2025

Table of Contents

Introduction 2

Subsection 42(1) or 51(1) of the ACA: Policies, practices, and services to reduce and remove barriers. 2

- Employment 2
- The Built Environment 3
- Service Animals 4
- Communications 4
- Product Information 4
- Design and Delivery of Programs and Services 5
- Alternative Formats 5
- Website Accessibility 5

Subsection 44(4) or 53(4) of the ACA: Consultation with persons with disabilities. 5

- Consulting for the Plan 5
- Consulting for the Progress Report 6

Subsection 44(5) or 53(5) of the ACA: Feedback process and how that feedback was taken into consideration. 6

Introduction

As a telecommunications service provider (TSP), Airus, Inc., d/b/a Peerless Network, a Delaware company ("the Company"), remains committed to prioritizing accessibility within its communication tools for all users. Ensuring that the diverse needs of its customers are reflected in its planning initiatives continues to guide how the Company implements inclusive and innovative solutions. Our purpose remains clear: to continuously improve how we connect with the world – including persons with disabilities.

An integral part of this mission is identifying, preventing, and removing barriers that impact accessibility. In adherence to regulatory requirements and industry best practices, our staff actively engages with third-party opportunities to advance accessibility and foster collaboration. As part of its ongoing commitment, the Company's regulatory team has participated in training focused on mobility and compliance with the Americans with Disabilities Act (ADA). This training reinforces the understanding of the challenges individuals with mobility disabilities face in accessing public services and ensures that our policies and practices align with evolving accessibility standards.

Whether through adaptive technologies, accessible interfaces, or regulatory compliance, the Company recognizes that telecommunications is a lifeline, and it remains dedicated to advancing equitable access. As we commit to our Accessibility Plan and develop Progress Reports, we continue to rely on valuable input from our customers, employees, business partners, consumer disability rights advocacy organizations, and other stakeholders.

Subsection 42(1) or 51(1) of the ACA: Policies, practices, and services to reduce and remove barriers.

Employment

The Company is dedicated to the fulfillment of its Accessibility Plan plan regarding all aspects of employment, including but not limited to recruiting, hiring, placement, transfer, training, promotion, rates of pay, and other compensation, termination, and all other terms, conditions, and privileges of employment. We are committed to complying with all federal, provincial, and municipal laws providing equal employment opportunities, and all other applicable employment laws and regulations.

We strive to maintain a work environment that is free of harassment, discrimination, or retaliation based on any legally recognized basis including physical or mental disability, medical condition. Our commitment to accessibility applies to all persons involved in our operations and prohibits unlawful discrimination by any employee, including managers and co-workers.

Consistent with this commitment, the Company will provide reasonable accommodation to otherwise qualified individuals where appropriate and to allow the individual to perform the

essential functions of the job, unless doing so would create an undue hardship on the business. If an employee requires accommodation because of a disability, it is the employee's responsibility to notify his/her manager.

The employee may be asked to include relevant information such as:

- A description of the proposed accommodation.
- The reason for required accommodation.
- How the accommodation will help the employee perform the essential functions of the job.

After receiving the request, the Company will engage in an interactive dialogue with the employee to determine the precise limitations of his/her disability and explore potential reasonable accommodations that could overcome those limitations. Where appropriate, we may need employee permission to obtain additional information from a medical provider. All medical information received by the Company in connection with a request for accommodation will be treated as confidential.

The Company encourages employees to suggest specific reasonable accommodation that they believe would allow them to perform their jobs. However, the Company is not required to make the specific accommodation requested and may provide an alternative accommodation, to the extent any reasonable accommodation can be made without imposing an undue hardship on the Company. No employee or prospective employee will be subjected to dismissal, discrimination, harassment, blacklisting, intimidation, retaliation, or other employment decision based on requesting practices and resources that facilitate accessibility.

As a note, improved accessibility efforts depend largely on employees telling us about any potential barriers they come across. If employees feel that additional improvements to accessibility can be made, we encourage this feedback. For those who want to remain anonymous, the Company website has a specific form to submit feedback on accessibility efforts.

The Built Environment

We do not have a built environment in Canada at this time. For physical spaces managed/controlled by the Company in the U.S., which are open to its employees or members of the public, are designed for accessibility. This includes the presence of wheelchair ramps, wheelchair accessible bathrooms, braille signage in the building and elevators, audible floor and destination announcement in elevators, wheelchair accessible parking, a wheelchair lift, and designated rescue areas for individuals who are injured or mobile impaired during an emergency evacuation.

Service Animals

Service animals are defined as dogs or miniature horses that are individually trained to do work or perform tasks for people with disabilities. Examples of such work or tasks include guiding people who are blind, alerting people who are deaf, pulling a wheelchair, alerting, and protecting a person who is having a seizure, reminding a person with mental illness to take prescribed medications, calming a person with Post Traumatic Stress Disorder (PTSD) during an anxiety attack, or performing other duties. Service animals are working animals, not pets.

Service animals are welcome in all physical spaces managed/controlled by the Company that are open to its employees or members of the public. A service animal must be under the control of its handler. Service animals must be harnessed, leashed, or tethered, unless the individual's disability prevents using these devices or these devices interfere with the service animal's safe, effective performance of tasks. In that case, the individual must maintain control of the animal through voice, signal, or other effective controls.

When it is not obvious what service an animal provides, only limited inquiries are allowed. Staff may ask two questions: (1) is the dog a service animal required because of a disability, and (2) what work or task has the dog been trained to perform. Staff cannot ask about the person's disability, require medical documentation, require a special identification card or training documentation for the dog, or ask that the dog demonstrate its ability to perform the work or task.

Communications

The Company makes reasonable attempts to communicate with people with disabilities in ways that best meet their accessibility needs. This includes providing written materials to people who are blind, low vision, or have other print disabilities such as dyslexia, with materials in braille, large print, audio, or another alternate format, upon request. It also includes relay services and direct video calling American Sign Language and Quebec Sign Language support for deaf, hard-of-hearing, and speech-impaired individuals. Those with disabilities will be assisted on a case-by-case basis. The Company will endeavor to work with each individual and their unique needs.

Product Information

For products and devices, we can provide access to user guides, installation guides, and product support. This includes information on the product in general and on its accessibility features. Access requires provision of information through alternate formats or modes of communication, such as:

- Braille
- Cassette recordings
- Large print
- Electronic text

- Internet postings
- TTY access
- Captioning and audio description for video materials

Design and Delivery of Programs and Services

All websites and web-based software are designed with accessibility in mind. We utilize frameworks that natively support accessibility. The final design is reviewed by developers who are experts in the nuances of developing accessible web software.

Alternative Formats

The Company can provide paper bills upon request at no charge to customers who self-identify as a person with a disability. The Company provide the following documents in alternative formats to persons with visual impairments, upon request: information on the National Do Not Call List, information on bill management tools, retail quality of service information, notification of the removal of the last payphone in a community, the incumbent local exchange carriers' communications plans on local forbearance, and information on dialing plan changes. Accessibility plans, progress reports, and descriptions of feedback processes published under the ACA are available, upon request, in print, large print, braille, audio format, electronic format that is compatible with adaptive technology that is intended to assist persons with disabilities, or any other format that the person and the regulated entity agree upon and for which there is proof of the agreement.

Website Accessibility

The Company can make the information on telecommunications and broadcasting services and products on our website accessible to the point of providing a reasonable accommodation for persons with disabilities. The Company can make customer service functions that are available solely over the service providers' websites accessible. If a customer service function on the service providers' website is not accessible, then persons with disabilities will not be charged or otherwise disadvantaged for using an alternate channel to access those functions. The Company has a home page link to the accessibility section of our website.

Subsection 44(4) or 53(4) of the ACA: Consultation with persons with disabilities.

Consulting for the Plan

We have developed our Accessibility Plan in close collaboration with an external lawyer who has a strong understanding of the needs of consumers with disabilities and the unique challenges they face every day. Having been blind all his life, our lawyer is a proficient braille reader and intimately familiar with a wide range of adaptive technologies, including popular

screen reading software for all types of digital platforms. Additionally, as a leader in the National Federation of the Blind, he understands first-hand the successes and struggles faced by blind and low vision individuals in all aspects of life. Finally, thanks to his experiences as a digital accessibility attorney, he has given us invaluable practical advice on barriers faced by users of digital products with hearing, physical, and cognitive limitations, and how to remove these barriers. Our accessibility lawyer reviewed and provided extensive feedback on drafts of our plan.

Consulting for the Progress Report

One of our employees, who has been diagnosed with multiple learning disabilities, has played an integral part in developing our Accessibility Plan and this Progress Report. This employee is actively involved with a non-profit national information and public advocacy platform. The organization brings together members of its divergently-abled community and allies to change a culture that often demands conformity over equity and inclusion. One of the organization's primary goals is to remove obstacles that keep individuals with challenges on the sidelines, promoting both physical and mental well-being.

Subsection 44(5) or 53(5) of the ACA: Feedback process and how that feedback was taken into consideration.

Given that our Accessibility Plan is relatively new, we have not yet received feedback from the public. However, we worked closely with one of our employees who has been diagnosed with multiple learning disabilities to review both our Accessibility Plan and the Progress Report.

Our Accessibility Plan is reviewed at least annually by an interdepartmental team from Legal and Regulatory who consider the feedback we receive through our feedback process and report on its progress. We have designated the Director of Regulatory Affairs to receive feedback on barriers discussed in our Accessibility Plan.

Improved accessibility efforts depend largely on employees, customers, and the public telling us about any potential barriers they come across. If these individuals feel that additional improvements to accessibility can be made, we encourage this feedback. For those who want to remain anonymous, the Company website has a specific form to submit feedback on accessibility efforts.